

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Cause No. 23 CR 1483 MLG
	§	
JOSEPHINE BEKAY, et al.,	§	
	§	
Defendants.	§	

UNOPPOSED MOTION SEEKING PERMISSION FOR TRAVEL

JOSEPHINE BEKAY, Defendant, by and through her undersigned appointed counsel moves this Court for an order granting permission to travel as discussed below, and in support of the motion would respectfully show the Court as follows:

1. Ms. Bekay is charged by grand jury indictment with kidnapping and conspiracy to commit kidnapping [Doc. 2]. The alleged offenses occurred in 2021. Ms. Bekay was arraigned on the charges on October 26, 2023. She was released on her own recognizance [Doc. 25] and is currently living at her home in Utah and complying with the conditions of her release. The Court granted a modification of Ms. Bekay's conditions of release, expanding her permitted travel

and ability to communicate with her sister, co-defendant Seraphine Warren-Begay, other than about the charges in this case [Doc. 67].

2. Ms. Begay works as a security guard for the Ute Tribe in Utah. She recently received a promotion to a supervisory position, one that requires training. She is scheduled to attend a training program along with her supervisor and other co-workers in Las Vegas, Nevada on March 14 and 15, 2024. She will need to travel to Las Vegas on Wednesday, March 13, returning on Saturday, March 16, to attend the program. Ms. Bekay has spoken with her supervising Pretrial Services officer about this.

3. The undersigned counsel has conferred with counsel for the government regarding this motion. The government does not oppose the relief requested in this motion.

WHEREFORE, JOSEPHINE BEKAY, Defendant, by and through her undersigned appointed counsel, respectfully moves this Court for an order authorizing her travel from her home in Ft. Duchesne, Utah to Las Vegas, Nevada for work-related training, from Wednesday, March 13, 2024 through Saturday, March 16, 2024, and providing for such other and further relief to which the Court may find Ms. Begay to be justly entitled.

Respectfully Submitted,

/s/ *Electronically filed on 2/20/24*

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